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RIFKIN LAW OFFICE

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UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

CA NO. 05-10696RGS

Defendants Cousins and Marks

STEPHEN C. PFAFF, BBO#553057 MERRICK, LOUISON & COSTELLO

By their Attorney,

67 Batterymarch Street

Boston, MA 02110 (617) 439-0305

ARTHUR AUSTIN, **Plaintiff**

VS.

FRANK COUSINS, MICHAEL MARKS, ESSEX COUNTY CORRECTIONAL FACILITY. ELAINE BUSHWAY, BRIAN LAVOIE. THOMAS FRANCESCONI, JASION COPP, ROBERT KOSTAN and JOSEPH GOLDSTEIN Defendants

JOINT DISCOVERY STATEMENT

- 1. Discovery plan: The parties shall conduct depositions, answer interrog ries and produce documents by March 31, 2006.
- 2. Proposed schedule for filing motion(s): The parties shall file motions by March 31, 2006.
- 3. The parties certify that they have unsuccessfully attempted mediation recently.

Plaintiff by his Attorney,

PATRICK V. MORGAN, BBO#557938 RIFKIN LAW OFFICES 60 Federal Street Salem, MA 01970 (978) 745-9786

Defendants Lavoie, Francesconi, Copp. Kostan and Goldstein

By their Attorney,

HOWARD B. LENOW, BBO#293660

LENOW & MCCARTHY 13 Pelham Island Road Wayland, MA 01778 (508) 358-8181

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